

# EXHIBIT A

1 STATE BAR OF CALIFORNIA  
2 OFFICE OF THE CHIEF TRIAL COUNSEL  
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14  
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**PUBLIC MATTER  
FILED**

**DEC 06 2013**

STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

8  
9 STATE BAR COURT  
10 HEARING DEPARTMENT - LOS ANGELES  
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13 In the Matter of: ) Case No. 12-O-16924  
14 JOSEPH DARRELL PALMER, ) NOTICE OF DISCIPLINARY CHARGES  
15 No. 125147, )  
16 A Member of the State Bar )  
17

**NOTICE - FAILURE TO RESPOND!**

18 **IF YOU FAIL TO FILE A WRITTEN ANSWER TO THIS NOTICE  
19 WITHIN 20 DAYS AFTER SERVICE, OR IF YOU FAIL TO APPEAR AT  
20 THE STATE BAR COURT TRIAL:**

21 (1) **YOUR DEFAULT WILL BE ENTERED;**  
22 (2) **YOUR STATUS WILL BE CHANGED TO INACTIVE AND YOU  
23 WILL NOT BE PERMITTED TO PRACTICE LAW;**  
24 (3) **YOU WILL NOT BE PERMITTED TO PARTICIPATE FURTHER IN  
25 THESE PROCEEDINGS UNLESS YOU MAKE A TIMELY MOTION  
26 AND THE DEFAULT IS SET ASIDE, AND;**  
27 (4) **YOU SHALL BE SUBJECT TO ADDITIONAL DISCIPLINE.  
28 SPECIFICALLY, IF YOU FAIL TO TIMELY MOVE TO SET ASIDE  
/// OR VACATE YOUR DEFAULT, THIS COURT WILL ENTER AN  
/// ORDER RECOMMENDING YOUR DISBARMENT WITHOUT  
/// FURTHER HEARING OR PROCEEDING. SEE RULE 5.80 ET SEQ.,  
/// RULES OF PROCEDURE OF THE STATE BAR OF CALIFORNIA.**

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kwiktag \* 152 145 629  


1                   The State Bar of California alleges:

2                   JURISDICTION

3                   1. Joseph Darrell Palmer ("Respondent") was admitted to the practice of law in the State  
4                   of California on December 15, 1986, was a member at all times pertinent to these charges, and is  
5                   currently a member of the State Bar of California.

6                   COUNT ONE

7                   Case No. 12-O-16924  
8                   Business and Professions Code, section 6106  
9                   [Moral Turpitude - Misrepresentation]

10                  2. On or about June 2, 2010, Respondent filed an Affidavit in support of a Motion for  
11                  Admission Pro Hac Vice in *Gemelas v. The Dannon Co., Inc.*, case no. 1:08-CV-00236, in  
12                  United State District Court, Northern District of Ohio, Eastern Division, in which Respondent  
13                  declared under oath "I have never been the subject of disciplinary action of any kind before any  
14                  bar or court" when, in fact, Respondent knew or was grossly negligent in not knowing the  
15                  declaration was false, and thereby committed an act involving moral turpitude, dishonesty or  
16                  corruption in willful violation of Business and Professions Code, section 6106.

17                   COUNT TWO

18                   Case No. 12-O-16924  
19                   Business and Professions Code, section 6106  
20                   [Moral Turpitude - Misrepresentation]

21                  3. On or about January 7, 2011 Respondent filed an Application for Leave to Appear Pro  
22                  Hac Vice in *Mark A. Arthur et.al. v. Sallie Mae, Inc.*, case no. 10-CV-00198-JLR in United State  
23                  District Court, Western District of Washington, in which Respondent declared under penalty of  
24                  perjury "I have not been disbarred or formally censured by a court of record or by a state bar  
25                  association....," when, in fact, Respondent knew or was grossly negligent in not knowing the  
26                  declaration was false, and thereby committed an act involving moral turpitude, dishonesty or  
27                  corruption in willful violation of Business and Professions Code, section 6106.

### COUNT THREE

Case No. 12-O-16924

**Business and Professions Code, section 6106  
[Moral Turpitude - Misrepresentation]**

4       4. On or about July 5, 2012 Respondent filed an Application for Leave to Appear Pro  
5       Hac Vice in *Alyson Herfert, et al. v. Crayola, LLC*, case no. 11-CV-1301-JCC, in United State  
6       District Court, Western District of Washington, in which Respondent declared under penalty of  
7       perjury "I have not been disbarred or formally censured by a court of record or by a state bar  
8       association . . .," when, in fact, Respondent knew or was grossly negligent in not knowing the  
9       declaration was false, and thereby committed an act involving moral turpitude, dishonesty or  
10      corruption in willful violation of Business and Professions Code, section 6106.

## **NOTICE - INACTIVE ENROLLMENT!**

**YOU ARE HEREBY FURTHER NOTIFIED THAT IF THE STATE BAR COURT FINDS, PURSUANT TO BUSINESS AND PROFESSIONS CODE SECTION 6007(c), THAT YOUR CONDUCT POSES A SUBSTANTIAL THREAT OF HARM TO THE INTERESTS OF YOUR CLIENTS OR TO THE PUBLIC, YOU MAY BE INVOLUNTARILY ENROLLED AS AN INACTIVE MEMBER OF THE STATE BAR. YOUR INACTIVE ENROLLMENT WOULD BE IN ADDITION TO ANY DISCIPLINE RECOMMENDED BY THE COURT.**

## **NOTICE - COST ASSESSMENT!**

IN THE EVENT THESE PROCEDURES RESULT IN PUBLIC  
DISCIPLINE, YOU MAY BE SUBJECT TO THE PAYMENT OF COSTS  
INCURRED BY THE STATE BAR IN THE INVESTIGATION, HEARING  
AND REVIEW OF THIS MATTER PURSUANT TO BUSINESS AND  
PROFESSIONS CODE SECTION 6086.10.

Respectfully submitted,

THE STATE BAR OF CALIFORNIA  
OFFICE OF THE CHIEF TRIAL COUNSEL

26 DATED: December 6, 2013

By:   
Christine Souhrada  
Senior Trial Counsel

**DECLARATION OF SERVICE BY CERTIFIED MAIL**

1                   **CASE NUMBER: 12-O-16924**

2  
3                   I, the undersigned, over the age of eighteen (18) years, whose business address and place  
4                   of employment is the State Bar of California, 1149 South Hill Street, Los Angeles, California  
5                   90015, declare that I am not a party to the within action; that I am readily familiar with the State  
6                   Bar of California's practice for collection and processing of correspondence for mailing with the  
7                   United States Postal Service; that in the ordinary course of the State Bar of California's practice,  
8                   correspondence collected and processed by the State Bar of California would be deposited with  
9                   the United States Postal Service that same day; that I am aware that on motion of party served,  
10                  service is presumed invalid if postal cancellation date or postage meter date on the envelope or  
11                  package is more than one day after date of deposit for mailing contained in the affidavit; and that  
12                  in accordance with the practice of the State Bar of California for collection and processing of  
13                  mail, I deposited or placed for collection and mailing in the City and County of Los Angeles, on  
14                  the date shown below, a true copy of the within

15                   **NOTICE OF DISCIPLINARY CHARGES**

16                  in a sealed envelope placed for collection and mailing as certified mail, return receipt requested,  
17                  Article No.: 7196 9008 9111 6410 5893, at Los Angeles, on the date shown below, addressed to:

18                  **Joseph D. Palmer**  
19                  **PO Box 548**  
20                  **Cardiff, CA 92007**

21                  **And Courtesy Regular U.S. Mail:**

22                  **Susan Lynn Margolis**  
23                  **Margolis & Margolis LLP**  
24                  **2000 Riverside Dr**  
25                  **Los Angeles, CA 90039**

26                  in an inter-office mail facility regularly maintained by the State Bar of California addressed to:

27                  **N/A**

28                  I declare under penalty of perjury under the laws of the State of California that the  
29                  foregoing is true and correct. Executed at Los Angeles, California, on the date shown below.

30                  **DATED: December 6, 2013**

31                  Signed:

32                    
33                  **Max Carranza**  
34                  **Declarant**